

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

MICHAEL RICHARD,)	
)	
Plaintiff,)	
)	
v.)	Case No. CIV-16-01427-M
)	
FIREMAN’S FUND INSURANCE)	
COMPANY, NATIONAL SURETY)	
CORPORATION,)	
)	
Defendants.)	

JOINT STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW the Plaintiff, Michael Richard, by and through his counsel of record, Simone Gosnell Fulmer, Harrison C. Lujan, and Jacob L. Rowe, of the Fulmer Group, PLLC, and the Defendants, Fireman’s Fund Insurance Company and National Surety Corporation, by and through their counsel of record, Charles D. Neal, Jr. of the firm Steidley & Neal, P.L.L.C. and Andrew M. Edison of the firm Edison, McDowell & Hetherington LLP, and pursuant to Rule 41(a)(1)(A)(ii), stipulate to dismissal of the above-styled action with prejudice to the further refiling thereof. The parties would show the Court that an agreed and compromised settlement has been reached between the parties hereto and there remain no issues to be litigated herein.

Date this 9th day of June, 2017.

/s/Simone G. Fulmer

Simone Gosnell Fulmer, OBA #17037

Harrison C. Lujan, OBA #30154

Jacob L. Rowe, (OBA # 21797

FULMER GROUP PLLC

Post Office Box 2448

Oklahoma City, OK 73101

Telephone: (405) 510-0077

Facsimile: (405) 510-0077

sfulmer@fulmergrouplaw.com

hlujan@fulmergrouplaw.com

jrowe@fulmergrouplaw.com

ATTORNEYS FOR PLAINTIFF

/s/Charles D. Neal, Jr.

Charles D. Neal, Jr., OBA #6591

Steidley & Neal, P.L.L.C.

CityPlex Towers, 53rd Floor

2448 East 81st Street

Tulsa, OK 74137

Telephone: (918) 664-4641

Facsimile: (918) 664-4133

cdn@steidley-neal.com

-AND -

Andrew M. Edison, Texas Bar # 00790629

Edison McDowell & Hetherington, LLP

First City Tower

1001 Fannin Street, Suite 2700

Houston, TX

(713) 337-5580

(713) 337-8850 Facsimile

Andrew.edison@emhllp.com

ATTORNEYS FOR DEFENDANTS